



**Michael A. Parente**  
Associate

April 15, 2022

**VIA ELECTRONIC FILING**

The Honorable Toby J. Heytens, United States Circuit Judge  
The Honorable Margaret B. Seymour, Senior United States District Judge  
The Honorable Richard M. Gergel, United States District Judge

*Re: S.C. State Conf. of the NAACP and Taiwan Scott v. Alexander, et al.*  
*Docket No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.)*

Dear Judge Heytens, Judge Seymour, and Judge Gergel:

Pursuant to the Court's Order of April 13, 2022 (ECF No. 221), Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), submit the amended privilege log (**Exhibit A**), which contains the remaining documents over which House Defendants are asserting privilege. Simultaneous with this filing, House Defendants are submitting the 15 listed documents for an *in camera* review via email based on instructions previously provided to us for submitting documents for *in camera* review.

Austin

Charleston

Charlotte

**Columbia**

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh

As suggested by Judge Gergel during the telephone hearing on April 12, 2022, House Defendants and Plaintiffs participated in a meet and confer on April 14, 2022. As a result of that meet and confer, House Defendants removed a document that was not privileged, identified and removed a duplicate, and came to agreement with Plaintiffs to remove from the privilege log certain emails from Nexsen Pruet to House staff attorneys.

If the Court has any questions about or needs further information concerning any of the documents included in this log, we stand ready to provide any information that would be helpful to aid the Court in its review. To the extent that this privilege log is updated, House Defendants will provide this Court any additional documents.

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**Attorneys and Counselors at Law**

The Honorable Toby J. Heytens  
The Honorable Margaret B. Seymour  
The Honorable Richard M. Gergel  
April 15, 2022  
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With highest regards,

A handwritten signature in blue ink, appearing to read "M Parente", with a long horizontal flourish extending to the right.

Michael A. Parente

cc: All Counsel of Record

Enclosure